ENVIRONMENTAL ENTERPRISES INCORPORATED

TREATMENT FACILITY
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Cincinnati, Ohio 45232
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EPA ID#: OHD 083377010

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June 22, 2017

Mr. Jae Lee
US EPA
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Jae,

This letter and attachments are in response to your comments from your email regarding Environmental Enterprises, Inc. (EEI) TSCA Application.

1. Please see attached updated information on EEI's Closure Cost Estimate.
2. Please see attached updated page with correction.
3. PCB Storage: Please see attached updated pages that include the Floodplain information. EEI's PCB storage requirements are in compliance with 40 CFR 761.65(b) criteria: adequate roof and walls, adequate floor that is separated from the rest of the facility with an 8" high curb and a flexible urethane coated/sealed concrete floor and walls; the maximum inventory is 4,684 gallons with containment of the total volume of PCB Articles or Containers being 2,369 gallon capacity, which is greater than 25% (1,171 gallons) of the total internal volume stored; there are no drain, joints, sewer lines or other openings in this area; the area is constructed out of non-porous surfaces EEI is not located below the 100-year flood elevation; EEI has a Ohio Part B Permit and is permitted to handle hazardous waste.
4. Handling Procedure: Please see attached updated page that indicates that EEI only stores PCB's and EEI does not treat PCB waste. Material are shipped off-site as received.
5. Per DOT specifications, PCB's are a Class 9 and this is applicable for wooden crates.
6. Please see attached updated page for Inventory and Containment Calculations. The floor is separated from the rest of the facility with an 8" high curb and a flexible urethane coated/sealed concrete floor and walls; the maximum inventory is 4,684 gallons with containment of the total volume of PCB Articles or Containers being 2,369 gallon capacity, which is greater than 25% (1,171 gallons) of total internal volume stored. Please see attached updated page for Inventory and Containment Calculations.
7. Please see that attached Sampling and analysis of the PCB's.
8. Please see attached proof of financial assurance.
9. Public Relation: There have been no discussion or comments received from public relation activities during the comment period or public hearing for EEI's current TSCA approval.

10. Environmental Justice: Please see attached comment. EEI is involved with the community public activities for the Spring Grove Community. EEI submits all PCR's to local officials. EEI attends the local community council meetings.
11. Please see the attached Waste Analysis Plan for sampling and analyses of PCB's.

If you have any further questions or concerns, please do not hesitate to call me.

Sincerely,
ENVIRONMENTAL ENTERPRISES, INC.

Melissa Joering
Office Manager

Attachments

COMMERCIAL PCB STORAGE RENEWAL APPLICATION
ENVIRONMENTAL ENTERPRISES, INC.
4650 Spring Grove Avenue
Cincinnati, OH 45232
513/541-1823
OHD 083377010

PCB STORAGE CAPACITY

The containment area has been constructed to provide containment for 25 percent of the maximum inventory of PCB containers and articles. The height of the ramps and curbs are 8".

The building is a four (4) story building with concrete floors and a concrete roof, which was replaced in 2010. The roof contains stormwater drains. It is very unlikely that precipitation would enter through the roof and penetrate three (3) concrete floors to the ground level PCB storage area. The building has concrete, brick walls and glass block on all sides. No rain is able to enter the building through the walls.

INVENTORY

The maximum inventory is 80 x 55 gallon drums and 4 x 9.5 cubic feet transformers. The maximum gallons at the time of closure could be:

80 x 55	= 4,400 gallons
4 x 9.5 x 7.48	= 248 gallons
TOTAL	**= 4,684 gallons**

The maximum inventory is 4,684 gallons with containment of the total volume of PCB Articles or Containers being 2,369 gallons capacity, which is greater than 25% (1,171 gallons) of the total internal volume stored.

TYPES OF PCB'S FOR STORAGE

The type of PCB's EEI accepts are capacitors, ballasts, oil, contaminated soils, debris, paint, solvents, and transformers.

The types of containers EEI receives containing PCB's include; 55-gallon, 85-gallon and 110-gallon drums (UN1A1 and UN1A2), pails (1H2), and totes, which are used for storage.

RCRA INFORMATION

A copy of the letter from EPA confirming our EPA Identification Number for the facility is attached.

The personnel contact list for PCB storage is contained in the RCRA Contingency Plan in Section G.

The point of contact for Environmental Enterprises, Inc. (EEI) is Daniel J. McCabe, P.E. President at 513/541-1823. The employees who are responsible for handling PCBs include Joe Combs, Marty James, Daniel McCabe, Tom McCabe, and Warren Taylor. Copies of the current training records for these individuals are attached.

A topographic map for the facility is contained in the RCRA Permit Section B.2, which shows five foot (5') contour intervals at a scale of 1"=200'.

FACILITY ACCESS AND FACILITY ROADWAY SURFACES

Access to the facility is via four and five lane public roads, from I-75 to Mitchell Avenue (Exit 6); west on Mitchell to the 2nd traffic light and; left onto Spring Grove Avenue. The facility is accessed by a left turn lane at the traffic signal at Winton Road. All access is via paved roadway. Spring Grove Avenue is an alternate to I-75 and is accustomed to heavy truck traffic. The facility parking and interior access has been completely paved with road grade asphalt. See the attached Traffic Flow map.

RECORD KEEPING AND REPORTING

EEI has received confirmation of notification as a PCB waste handler and has been assigned the same EPA ID# that is used for hazardous waste activities.

EEI maintains a computerized PCB inventory record within the operating log of the facility. This log contains information relative to the receipt, storage and of PCB's. The operating log for PCB's is similar to the RCRA operating log contained in the RCRA permit in Section C-3.

A PCB bar code is printed for each container. Each PCB bar code is uniquely numbered and contains the following information:

-Inventory Number
-Date Received
-Generator
-Serial Number
-Marked for Article or Container

An annual report will be prepared each year, which summarizes all PCB handling activities for the previous year. This report will include the name, address, identification number, storage date, and facility shipped to in the previous year.

All records, including the annual report, operating log, and certificates of disposal shall be maintained for either 3-years after the facility has closed or stopped taking PCB's.

CLOSURE PLAN

Environmental Enterprises, Inc. (EEI) does not wish to qualify for the exemption provided for in 40 CFR 761.65 (d) (6). The TSCA Closure Plan is attached with a separate Trust Fund held by HUNTINGTON BANK, which is funded by a Letter of Credit which is separate from the RCRA Financial Assurance Mechanism for closure.

As provided in 761.65 (g) (1) (i), as an existing facility, EEI has established and funded the attached Trust Agreement for Closure.

FINANCIAL RESPONSIBILITY

Proof of financial assurance as outlined in CFR761.65 (g) (1) (i) is met by the Trust Agreement and a current Closure Plan Cost Estimate based upon 2012 costs, a current Certificate of Insurance for US EPA and a Letter of Credit.

The Closure Plan provides for the removal and disposal of all oils, capacitors and transformers. The Cost Estimate assumes worst case costs, i.e., incineration for oil and capacitors and decommissioning and landfill for transformers.

The on-site lab is not intended to be closed as part of the PCB facility. The lab will be closed as part of the RCRA facility closure, which would continue in operation after closure of the PCB facility.

CERTIFICATIONS

The certifications required by 40 CFR 761.65 (b), (c), and (f) are attached.

The certification that the person who owns or operates the facility is aware of and will adhere to the PCB reporting and record keeping requirements in subparts J and K is attached.

STATEMENT OF POLICY

Environmental Enterprises, Inc. (EEI) has closed its main analytical laboratory and uses Test America for all off-site compliance related analysis. The Test America Laboratory is a state and NELAC certified laboratory, which will use their then current waste analysis methodology and standard EPA methods that will be in use in 2029.

The current Quality Assurance Manual (QA/QC) for Test America is attached.

FLOOD PLAIN INFORMATION

An updated Flood Insurance Rate Map showing EEI marked as JZ0815, is attached. This information supersedes that contained in the RCRA Permit application. The building does not lie in the one hundred (100) year or five hundred (500) year flood plain of the Mill Creek.

Note: This map was last updated February 16, 2012.

INSPECTIONS AND TRAINING

Inspections are done of the PCB area, which comply with TSCA, RCRA and SPCC Inspection Requirements.

A written inspection schedule is included in the Contingency Plan Section F of the RCRA Permit. Copies of notifications to local authorities are included in the RCRA Permit as Attachment G-2. Training documentation is included in Section H of the RCRA Permit that meets RCRA, TSCA and SPCC requirements.

QUARTERLY SAMPLING PLAN & PROCEDURES

This PCB monitoring sampling plan involves sampling quarterly from five sampling areas outside the curbed PCB storage area, i.e. the lunch room floor and dock. This plan also includes steps to be taken in response to positive results >10 ug/100 cm^2. The walls of the storage area are sealed and do not require core sampling.

The only equipment used at the facility employed for daily operation of PCB wastes is a forklift. This forklift will be sampled and decontaminated as other contaminated items as described in the closure plan and response to spills.

SECURITY

The facility is secured by fencing, locked doors and natural barrier. All approaches are posted "DANGER, UNAUTHORIZED PERSONNEL KEEP OUT". Access is by keypad at all entrances from Spring Grove Avenue. Unauthorized vehicular access is prevented by locked gates at the east, center and west gates from Spring Grove Avenue.

Note: PCB identifying labels have been affixed to the access doors, adjacent pillars and walls of the PCB storage area.

FACILITY LOCATION

The facility is located in a heavy industrial area within Cincinnati, Ohio. The Mill Creek flows generally north to south and is within 270' at its closest point to the PCB storage area. The facility is secured by fencing, locked doors, cameras, and a natural barrier. All approaches are posted "Danger, Unauthorized Personnel Keep Out".

The facility which contains the PCB storage area is constructed of Portland cement floors, Portland cement walls and painted concrete block walls and was sealed with urethane. There are no in plant drains in or adjacent to the PCB storage area. The exterior is protected from spills by Portland cement curbs and ramps. There are no public or private drinking water wells within five (5) miles of the facility and these wells are located up gradient from the facility.

The address for the TSCA Storage Area is 4600 Spring Grove Avenue. The US EPA has determined that 4600 Spring Grove Avenue is contiguous property to 4650 Spring Grove Avenue, and both are included in the US EPA ID number OHD 083 377 010. The original assignment of this EPA ID number is attached.

SEISMIC ZONE INFORMATION

The facility is not located along a Fault or active Seismic Zone.

PUBLIC RELATIONS

The Public Relations between EEI and the community are very favorable. EEI faces no public opposition to our continued operation. We have been involved in this community since the late 1970's and have developed a working relationship with the Spring Grove Village Community Council (*formerly, Winton Place*). We support the Village on their Spring and Fall cleanups and function as the permanent Household Hazardous Waste collection center for Hamilton and Butler Counties. EEI also allowed the use of our building to paint a mural of the Past, Present and Future of the Spring Grove Village at the request of the community.

The public hearing on the original issuance of the Part B was not attended by anyone from the public and no public comment was received. The public hearing for the Part B Permit renewal in 2009 was attended by only four people and none of the comments received were negative or opposed the issuance of the Part B Permit. Recently, EEI processed two Class 2 Modifications adding volume and an expansion of storage areas on our RCRA Part B Permit and no one attended from the public.

The community has an active environmental group which has not lodged any complaints against EEI. EEI is a welcome member of the local business community.

ENVIRONMENTAL JUSTICE

The major Environmental Justice concern was that waste management facilities were being located close to economically disadvantaged and black communities. While this may have been true for some areas of the country, this was definitely not the case with EEI. EEI located to its present site in the late 1970's because it was the only site in Cincinnati that would store "red label" or flammable materials. The old Formica complex met the building and zoning codes for management of this type of material. The selection of this location was not based on race or economic issues. Dan McCabe made the decision to locate here based on the types of materials that needed to be stored. No other facilities were available that met the necessary criteria.

The Environmental Justice concern originally surfaced up in the 1990's. This was an issue for everyone in the 45232 zip code due to the presence of a municipal solid waste landfill (ELDA), a construction and demolition landfill (The Grey Road Landfill), and numerous manufacturing industries located in the Mill Creek Valley corridor. The area in which we are located contains the Mill Creek, the Mill Creek Expressway (I-75) and is in an industrial corridor that reaches from the Ohio River to the GE Aircraft Engine Plant in Evendale just south of I-275.

This permit renewal does not appear to have significant public health or environmental impact. Nevertheless, EEI will inform the public of this permit renewal by issuance of a public notice in the Cincinnati Enquirer and by a meeting with the Spring Grove Community Council to explain the permit process and help their understanding and knowledge of this permit renewal.

EEI proposes to develop a fact sheet that would explain what is proposed and present it during the community meeting. Community public activities include but are not limited to the Spring Grove Community picnics. EEI also submits all Permit Change Requests (PCR) to all local officials. EEI is involved with the community public activities for the Spring Grove Community. EEI attends the local community council meetings.

ENVIRONMENTAL VIOLATIONS

On December 28, 2012, EEI had an explosion and fire at the facility while processing sodium chlorate filters which reacted. The combination of sodium chlorate or cellulosic filters has explosive properties, which were not stated on the profile.

The reaction of this incompatible mixture was an intense fire, which was extinguished but did not cause a release to the environment. The Contingency Plan and fire suppression systems functioned as designed. As a result of this occurrence, Ohio EPA cited EEI for administrative deficiencies with respect to training, updating procedures and an annual recertification of profiles. All of which have been addressed at this time.

BACKGROUND AND EXPERIENCE

Environmental Enterprises, Inc. (EEI) has operated the current RCRA facility since 1979 and has an exemplary compliance history. In the past ten (10) years, EEI has no proven violations. Recent PCB inspections have no violations of TSCA regulations.

EEI's RCRA facility provides treatment of numerous types of wastes and provides a full range of treatment options, which include blending, chemical oxidation, chemical reduction, fixation, neutralization, cyanide destruction, precipitation, filtration, metal recovery, and hydrolysis.

EEI employs approximately 170 people including numerous chemists, Professional Engineers, and approximately 70 40-Hour HAZWOPER trained technicians. Facility personnel average five (5) years experience with the company and range from one (1) month to twenty-five (25) years overall experience. All personnel are thoroughly trained in RCRA compliance and in PCB compliance. EEI operates an on-site laboratory that serves as a Quality Assurance laboratory for the RCRA facility.

EEI's laboratory is fully equipped with state of the art instrumentation for the identification and quantization of PCB's. EEI operates two (2) GC's and one (1) GC/MS's, all of which are capable of PCB analyses.

KEY PERSONNEL

The following people have direct management responsibilities for the facility:

DANIEL J. MCCABE, P.E.	**PRESIDENT**
WARREN TAYLOR	**QUALITY ASSURANCE DIRECTOR**
MARTY JAMES	**ACTING PLANT MANAGER**
GARY BRUNNER	**APPROVAL CHEMIST**
MIKE YEARY	**LABORATORY MANAGER**
JOE MCCABE	**MAINTEANCE MANAGER**
JOE COMBS	**LOGISTICS MANAGER**
KYLE DUFFENS	**ANNEX MANAGER**
MELISSA JOERING	PLANT OFFICE MANAGER

Mr. McCabe attended the University of Cincinnati, majoring in Chemistry and has a Masters degree in Sanitary Engineering. Mr. McCabe is a Registered Professional Engineer in Ohio, Indiana and Kentucky. Mr. McCabe's professional career included work for US EPA and

Systech as an Environmental Engineer. Mr. McCabe has over forty (40) years experience in the environmental field.

Warren Taylor attended Capital University, majoring in Biology and received a Masters of Environmental Science degree from Miami University in 1979. Mr. Taylor worked for Cecos International for several years as a Quality Assurance Manager at the Williamsburg, Ohio landfill and as a Remedial Action Specialist. Mr. Taylor has worked for EEI for twenty-six (26) years as a Quality Assurance Director responsible for regulatory compliance regarding EEI's Analysis Plan and providing technical support for the President as new rules become effective.

Marty James is responsible for overall day to day operations of the facility. Mr. James has worked for EEI twenty (20) years and is familiar with all EEI's operating procedures including PCB's.

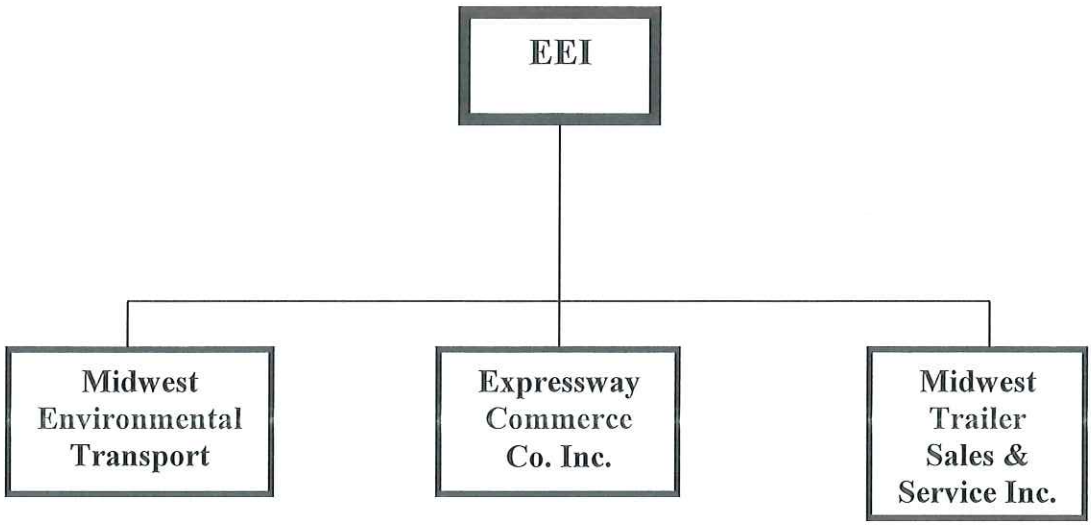
Kyle Duffens is responsible for the portion of the facility, which is the subject of this application. Mr. Duffens has worked for EEI for thirteen (15) years and is familiar with all EEI policies and procedures and has been trained regarding PCB Management.

None of the key employees have been convicted of environmental violations or received civil penalties for environmental violations at EEI or any other facility. The Ohio Bureau of Criminal Investigation Unit has performed a background investigation of all key employees of EEI and has not uncovered disqualifying crimes for any key employee.

CORPORATE OWNERSHIP AND AFFILIATED COMPANIES

EEI is a privately held Ohio Corporation, incorporated in 1976. EEI is an independent company that is not owned or controlled by a parent corporation.

EEI has three (3) wholly owned subsidiaries, Midwest Environmental Transport (MET), which serves as a hazardous waste and PCB transporter. The Expressway Commerce Company holds title to the Spring Grove Avenue facility. Midwest Trailer Sales and Services (MTSS) is a dormant corporation, which performed maintenance work on heavy trucks and trailers.



PCB STORAGE

EEI has constructed a separate PCB storage area at 4600 Spring Grove Avenue, which includes eight inch (8") high curbing and a flexible urethane coated/sealed concrete floor and walls. See product literature in the RCRA Permit as Attachment D-11. There are no drains, sewer lines, expansion joints, or other floor drains, etc.

The PCB storage area is a smooth sealed concrete with spill containment curbs and ramp. The walls which form part of the storage area to the west and north are sealed with the same sealant as the floor. The curb and ramps are also coated with this sealant. Above the PCB storage area, the building raises three (3) floors; three (3) floors of concrete and a composite roof provide protection from the weather. Approximately thirty feet (30') east of the PCB storage area, a concrete block wall separates the PCB storage area from the remaining building.

The storage area measures 24' x 20' with a capacity of eighty (80) drums of oil and/or capacitors and four (4) 9.5 cubic feet transformers or their equivalent. All material is stored in drums or crates or DOT compliant containers. The facility is served by seven (7) loading docks. Only the dock at the northwest corner is used to load and unload PCB's from transport vehicles.

A minimum of eight (8) inch high solid poured concrete curb forms the PCB storage area on the east side. A ten (10) foot concrete wall forms the west and north sides and a eight (8) inch concrete ramp forms the south side of the containment area.

The wall to the north is an exterior wall of the building, while the wall which forms the west side of the PCB storage area is an interior partition. The entire PCB area is within a concrete and concrete block building.

The building is a four (4) floor structure including a basement with concrete floors, and concrete block walls and concrete roof.

EEI occupies the entire building. The PCB storage area is located on the ground floor. See map B-8 in the RCRA Permit.

The loading docks are not used for the storage of PCB's. PCB containers and articles are removed from the transport vehicle and placed in the storage area. Conversely, materials being shipped off-site are taken directly from the storage area to the transport vehicle. Therefore, these loading/unloading areas are not subject to 40CFR761.65 (b).

An updated Flood Insurance Rate Map showing EEI marked as JZ0815, is attached. This information supersedes that contained in the RCRA Permit application. The building does not lie in the one hundred (100) year or five hundred (500) year flood plain of the Mill Creek.

HANDLING PROCEDURES

All PCB waste received at EEI is for storage only and must first be approved by EEI's Quality Assurance Department by submitting a PCB Waste Profile prior to shipment. EEI does not treat PCB waste. A copy of this PCB profile is included in the Waste Analysis Plan in the RCRA Permit. Materials are shipped offsite as received.

All PCB's received are tracked using bar codes. A unique bar code is assigned to each drum or piece of equipment. A computerized log is then utilized to track inventory through the facility from receipt to shipment off-site for disposal. Shipments are based on earliest date of generation first. Certificates of Disposal are forwarded to the generator upon receipt from the disposal facility.

The following containers are used at the facility:

5 gallon DOT UN1H2
55 gallon DOT UN1A1 AND UN1A2
30 gallon DOT UN1A1 AND UN1A2
4'x4'x4' Wooden Crates
4'X4'X4' Portable Tanks UN31HA
85 gallon recovery drum UN1A2 AND UN1H2
110 gallon recovery drum UN1A2 AND UN1H2
Cubic Yard Box UN11G/X/

CONTINGENCY PLAN

All spills of PCB contaminated material are to be cleaned up immediately using a combination of sorbents and kerosene followed by an alkaline degreaser wash and rinse.

Decontamination is repeated until testing confirms a level of less than 10ug/100cm^2 on sealed concrete, or the concrete may be removed and disposed of via landfill. Leaking containers are to be overpacked in fifty-five (55) gallon, eighty-five (85) gallon or one hundred and ten (110) gallon recovery drums.

The PCB storage area is to be inspected daily for leaks, proper storage, aisle space, etc. All safety equipment is inspected weekly.

In the event of a fire, the area has a sprinkler system with a central station alarm and all water is contained within the storage area and collected for analysis and disposal. Small fires may be extinguished using dry chemical extinguishers available throughout the facility. The RCRA Contingency Plan includes the TSCA storage area and is contained in Section G of the Permit Application.

CONTAINMENT CALCULATIONS

24 x 20 x 8/12 = cubic feet

Cubic feet x 7.48 = gallon container capacity (2,369 gallons)

Must be >25% of 4,684 gallons (1,171 gallons)